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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

April 22, 1996

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Re: Revision of Filing Requirements
CC Docket No. 96-23

Dear Mr. Caton:

Attached please find an original and 6 copies of ALLTEL's Reply Comments in connection with the above-referenced matter.

If you have any questions or need any additional information, please let me know.

Sincerely,

Carolyn C. Hill
Counsel for ALLTEL
Telephone Services Corporation

CCH/ss

Enclosures

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**Before the
Federal Communications Commission
Washington, D.C. 20554**

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

In the Matter of

Revision of
Filing Requirements

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CC Docket No. 96-23

REPLY COMMENTS

ALLTEL Telephone Services Corporation, on behalf of its affiliated local exchange companies (hereinafter "ALLTEL" or the "ALLTEL Companies"), respectfully submits its reply comments in response to the comments filed on April 8, 1996, in the above-captioned proceeding.

Comments were filed by fourteen parties, including ALLTEL, in response to the Commission's Notice of Proposed Rulemaking. ("NPRM") The comments supported the Commission's proposed elimination of thirteen common carrier reporting requirements and the reduction of the frequency of complying with six other reporting requirements. The filers endorsed the Commission's commitment to regulatory streamlining and reform and encouraged the adoption of further streamlining measures to reduce the regulatory burdens on LECs. Many of the filers had specific proposals. For example, Cincinnati Bell Telephone Company ("Cincinnati Bell") urged the Commission to increase the revenue threshold for filing cost allocation manuals ("CAMs") and other reports, to change the Part 32 "materiality" rules to conform to generally accepted accounting principles, ("GAAP") and to eliminate some redundant or unnecessary reports; e.g., the 495A and B reports and the ARMIS reports 43-05-07.

(Cincinnati Bell comments pgs. 1-4) ALLTEL endorses these proposals.


As pointed out by Cincinnati Bell, the current \$100 million threshold for filing CAMs and ARMIS reports could be increased to \$1 billion in the current environment without comprising the Commission's ability to obtain necessary information. *Id.* at p2. ALLTEL agrees with this assessment. Moreover, it should be noted that the revenue threshold for filing CAMs and ARMIS reports was developed in the 1985-1987 time frame when divestiture had only recently taken place and the monopoly franchise existed. Since that time, the \$100 million revenue threshold for filing CAMs and ARMIS reports has not changed, but the environment in which ALLTEL and other LECs operate has dramatically changed with the passage of the Telecommunications Act of 1996 ("96 Act") and the recent merger announcements of various large LECs.

With the Administration's commitment to eliminating or reducing unnecessary reporting through its Reinventing Government initiatives, as well as the Commission's attendant responsibilities in the 96 Act to implement regulatory reform, ALLTEL submits that the Commission should continue to move forward expeditiously with its positive efforts. These efforts should recognize the changes that have taken place in the industry and the marketplace. One responsive recognition of these changes would be to increase the revenue threshold for filing CAMs and ARMIS reports to \$1 billion dollars as suggested by Cincinnati Bell. Another threshold, equally as responsive, is the mid-size LEC standard established by the 96 Act. That standard creates a distinction between LECs with under two (2) percent of the nation's access lines and LECs of greater size.

CONCLUSION

In summary, ALLTEL supports the Commission's proposals set forth in the NPRM, together with the revisions and modifications set forth in ALLTEL's earlier comments. Moreover, ALLTEL believes that the adoption of the proposals set forth by Cincinnati Bell in its comments as well as the adoption of the two (2) percent standard for filing proposed herein by ALLTEL will serve the public interest.

Respectfully submitted,
ALLTEL Telephone Services Corporation

By: 
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Its Attorney

April 22, 1996

CERTIFICATE OF SERVICE

I, Sondra T. Spottswood, hereby certify that a copy of the foregoing "Reply Comments" was served this 22 day of April, 1996, by United States mail, first-class service, postage prepaid, unless otherwise noted, upon the following:

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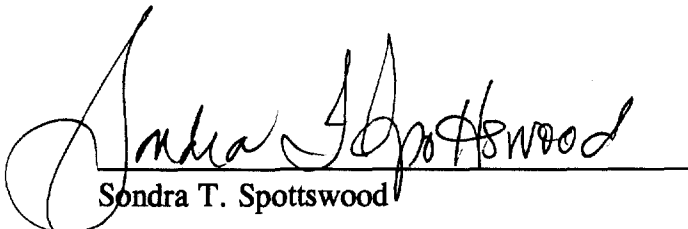
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